REMARKS

Claims 2-45 are pending in the application.

Claims 2-45 stand rejected.

Claims 2-45 have been amended.

Formal Matters

Applicants note the Office Action's requirement for formal drawings. Applicants further note that on August 3, 2005, formal drawings were submitted in the present case. Applicants respectfully submit that the August 3, 2005, formal drawings are responsive to the defects suggested by the Office Action.

Double Patenting

Claims 2-45 are rejected under the judicially created doctrine of obviousness-type double patenting as being unpatentable over claims 1-21 of the co-pending U.S. Patent Application No. 10/809,191. Claims 2-45 are rejected under the judicially created doctrine of obviousness-type double patenting as being unpatentable over claims 2-33 of the co-pending U.S. Patent Application No. 10/809,927. Terminal Disclaimers To Obviate A Double Patenting Rejection Over A Co-Pending Application are being filed concurrently with this Response with regard to Application No. 10/809,943 and U.S. Patent Application No. 10/809,927 to obviate these provisional rejections. Accordingly, Applicants respectfully request withdrawal of these rejections.

Rejection of Claims under 35 U.S.C. §101

Claims 2-45 stand rejected under 35 U.S.C. § 101 for being directed to non-statutory subject matter, specifically, as directed to an abstract idea. Applicants respectfully submit that, in addition to the amendments further addressing the Examiner's concerns, claims 2 and 24 are indeed tied to a technological art, environment and machine. For example, the claimed invention recites (1) the conversion of information into a target form that comprises "... a plurality of common data type elements ..."; (2) "...the common data type elements are adapted to be shared across a plurality of data objects in the intermediate form ..."; and (3) various forms of data that are "associated" with various "computerized system[s]". Each of these limitations is indicative of a method and computer program product that are by their very nature tied intimately to a technological art, environment and machine, that being computerized processes. Taking the first two examples, Applicants respectfully submit that "data type elements" and "data objects" are not physically or mentally manipulable by a human being – these are constructs used and intended for use by and within computing devices. As to the latter example, Applicants respectfully assert that the recitation of the use of "computerized system[s]" speaks for itself in this regard – the claimed invention is directed to a method that mandates the use of "computerized system[s]". Applicants therefore respectfully assert that the rejection of claims 2-45 under 35 U.S.C. § 101 is inapposite, as claims 2 and 24 are directed to an invention that is much more than simply an abstract idea.

Rejection of Claims under 35 U.S.C. §112

Claims 25-45 stand rejected under 35 U.S.C. § 112, first paragraph, as failing to comply with the enablement requirement. Applicants respectfully assert that the claims, as presented prior to the amendments made hereby, found full support in the Specification, and such would

enable one of skill in the art to practice the claimed invention. However, Applicants have respectfully chosen to amend claims 2 and 24 to provide further clarification. Applicants respectfully submit that this rejection is addressed thereby and that no new matter is added thereby, and so the requirements with regard to enablement under 35 U.S.C. § 112, first paragraph, continue to be met.

Claims 2-45 stand rejected under 35 U.S.C. § 112, second paragraph, as being indefinite for failing to particularly point out and distinctly claim the subject matter which Applicant regards as the invention. Applicants respectfully traverse this rejection in light of the amendments made to claims 2 and 24, which are clearly directed to common data type elements that are adapted to be shared across a plurality of data objects in the intermediate form. This is so for at least the reason that both the first and second corresponding information are in the intermediate form. This intermediate form, in turn, comprises a plurality of common data type elements. These common data type elements are adapted to be shared across a plurality of data objects in the intermediate form by definition, as these data objects are at least shared between both the first and second corresponding information, each of which comprises data objects (as both noted and claimed).

Rejection of Claims under 35 U.S.C. §103

Claims 2 and 24 stand rejected under 35 U.S.C. § 103(a) as being unpatentable over Bouziane, et al., U.S. Patent No. 5,727,158 (Bouziane) and Inohara, et al., U.S. Patent No. 6,377,952 (Inohara).

To establish a *prima facie* case of obviousness, three basic criteria must be met. First, there must be some suggestion or motivation, either in the references themselves or in the

knowledge generally available to one of ordinary skill in the art, to modify the reference or to combine reference teachings. Second, there must be a reasonable expectation of success. Finally, the prior art reference (or references when combined) must teach or suggest all the claim limitations. In teaching or suggestion to make the claimed combination and the reasonable expectation of success, must both be found in the prior art and not based on Applicants' disclosure. The initial burden is on the Examiner to provide some suggestion of the desirability of doing what the inventor has done. To support the conclusion that the claimed invention is directed to obvious subject matter, either the references must expressly or impliedly suggest that the claimed invention or the Examiner must present a convincing line of reasoning as to why the artisan would have found the claimed invention to have been obvious in light of the teachings of the references. MPEP 2142.

Applicants respectfully assert that, without finding need to reach any other criteria, that Bouziane and Inohara, taken separately or in any permissible combination, fail to teach all the elements of amended independent claims 2 and 24. For example, claim 2 now recites:

> 2.   A computer-implemented method comprising:
> managing enterprise data, wherein said managing enterprise data comprises
> > extracting enterprise information in a first form, wherein the first form is
> > > associated with a first source computerized system;
> > converting the enterprise information in the first form into first corresponding
> > > information, wherein the first corresponding information is in an
> > > intermediate form;
> > converting the corresponding information into first enterprise information,
> > > wherein
> > > the first enterprise information is in a target form,
> > > the target form corresponds to a target computerized system,

the intermediate form comprises a plurality of common data type

elements, and

the common data type elements are adapted to be shared across a plurality

of data objects in the intermediate form;

extracting enterprise information in a third form, wherein

the third form is associated with a second source computerized system,

and

the second source computerized system is distinct from the first source

computerized system;

converting the enterprise information in the third form into second corresponding

information, wherein the second corresponding information is in the

intermediate form; and

converting the second corresponding information into second enterprise

information, wherein the second enterprise information is in the target

form.

Claim 24 recites substantially similar limitations.

By contrast, Bouziane is directed to:

"An information processing system includes a plurality of data processing

tools, an atomic information repository, and a plurality of generated translation

engines. Each data processing tool processes data in accordance with an

associated data model, and in the process generates access requests for accessing

data in accordance with its associated data model. The atomic information

repository stores data items using an organization in an atomic data model which

corresponds to the combination of the data models associated with all of the tools.

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Each translation engine is associated with one of the tools. Each translation engine receives an access request from its associated tool in the associated tool's data model and performs a translation operation to translate the request to the repository's atomic data model, and initiates an access operation with the repository in connection with the translated access request. A system manager is provided which can, when a new tool is added to the system, update the repository's atomic data model to reflect the added tool's associated data model, generate a translation engine for the new tool, and also update the translation engines associated with the existing tools to reflect the update." (Bouziane, Abstract)

By further contrast, Inohara is directed to:

"In order to perform format conversion between the formats of a plurality of files without any work by a user, a file system stores a relation between a conversion originating file and a conversion destination file, and synchronously with an issue of a file operation API, the format conversion processes are executed. A user performs only the tasks essential for an application, without taking into consideration various necessary format conversions (either one-step or multi-step). During the user task, it is not necessary to designate a conversion originating file and a timing of format conversion. A user can use always a latest conversion destination file." (Inohara, Abstract)

Applicants respectfully assert that neither Bouziane or Inohara teaches:

> "...
>> the target form corresponds to a target computerized system,
>> the intermediate form comprises a plurality of common data type
>>> elements, and
>> the common data type elements are adapted to be shared across a plurality
>>> of data objects in the intermediate form;
> ..."

As an initial point, neither Bouziane or Inohara teaches these limitations, particularly with regard to an intermediate form being converted into a target form, where the <u>intermediate form</u> provides the commonality that allows the conversion of the intermediate form into a target form based on its use of common data type elements that are adapted to be shared across a plurality of data objects in the intermediate form.

As can be seen, Bouziane is directed to translating a given set of data into a form that can be accessed by one of a number of tools. Thus, Bouziane contemplates only a one-to-many conversion. By contrast, Inohara is directed to file format conversion, in which the conversion is from a (single) conversion originating file and a (single) conversion destination file. Thus, Inohara contemplates only a one-to-one conversion. At best (though Applicants do not concede that one of skill in the art would be motivated to combine their disclosures), the purported combination of Bouziane and Inohara would, at best, provide a one-to-one-to-many conversion.

By marked contrast, the claimed invention is directed to a <u>many-to-one-to-one</u> conversion. When using the claimed invention, enterprise information in a number of forms is extracted from corresponding source computerized systems into an intermediate form. This intermediate form provides the commonality that allows the conversion of the intermediate form into a target form based on its use of common data type elements that are adapted to be shared across a plurality of data objects in the intermediate form, as noted. These claimed features allow for the conversion of the various corresponding information into enterprise information in the target form. Thus, in the claimed invention, information is converted from many forms, into a form (the intermediate form) that provides the functionality needed to convert the various corresponding information in the intermediate form, into enterprise information in the target form.

The Office Action correctly states that Bouziane fails to teach the conversion of information from an intermediate form into a target form. Inohara is said to remedy this infirmity of Bouziane. Applicants respectfully disagree for the foregoing reasons, and therefore respectfully submit that this rejection is overcome thereby.

Claims 3-23 and 25-45 stand rejected under 35 U.S.C. § 103(a) as being unpatentable over Bouziane, et al., U.S. Patent No. 5,727,158 (Bouziane) and Inohara, et al., U.S. Patent No. 6,377,952 (Inohara) and further in view of Guyan, et al., U.S. Patent No. 7,124,112 (Guyan). Applicants respectfully assert that claims 3-23 and 25-45, which depend variously from claims 2 and 24, are allowable for at least the foregoing reasons.
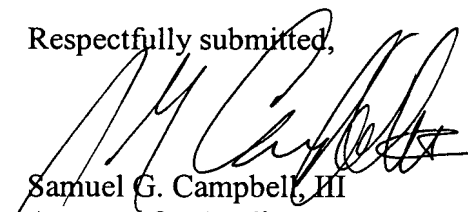
CONCLUSION

In view of the amendments and remarks set forth herein, the application is believed to be in condition for allowance and a notice to that effect is solicited. Nonetheless, should any issues remain that might be subject to resolution through a telephonic interview, the Examiner is invited to telephone the undersigned at 512-439-5084.

I hereby certify that this correspondence is being deposited with the United States Postal Service as First Class Mail in an envelope addressed to: Mail Stop Amendment, Commissioner for Patents, P.O. Box 1450, Alexandria, VA 22313-1450, on **June 15, 2007**.

_____   6/15/07
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